

EXHIBIT B.1

Exhibit B.1***In re Citibank August 11, 2020 Wire Transfers*, Case No. 20-cv-06539-JMF
Citibank's Deposition Designations****Code to Objections**

Code	Objection
A	Argumentative
AC	Attorney commentary/exchange
AF	Assumes facts not in evidence
CD	Compound
F	Lacks foundation
ID	Improper use of inadmissible document
IH	Incomplete Hypothetical
LC	Legal Conclusion
MT	Misstates prior testimony (mischaracterization)
S	Scope
V	Vague
FRE 401	Relevance
FRE 403	Unduly prejudicial, confusing, misleading, delay, waste of time, or cumulative
FRE 501	Privileged
FRE 602	Lack of personal knowledge; calls for speculation
FRE 611	Leading
FRE 701	Improper opinion by lay witness
FRE 802	Hearsay
30(b)(6)	Outside of the scope of the FRCP 30(b)(6) deposition topics for which witness was designated

Exhibit B.1: Citibank's Deposition Designations

Deposition of Catherine McCoy (Allstate 30(b)6)), dated October 15, 2020

Citibank's Designations	Defendants' Objections to Citibank's Designations	Defendants' Counter-Designations	Citibank's Objections to Defendants' Counter-Designations
12:7-9			
23:6-7			
25:19-25			
26:2-6		26:7-9	
26:21-25		27:4-28:22	
27:2-3		27:4-28:22	
28:24-25			
29:2-8		32:21-33:14	
29:13-14		32:21-33:14	
29:18-19		32:21-33:14	
29:21-25		32:21-33:14	
30:2-10			
33:22-25			
34:2-5			
34:9-13			
34:15-17		34:21	
34:23-24		34:21	
35:4-6			
35:8-14		35:15-24; 36:12-18	
41:14-22			
42:2-4			
42:6-16			
42:18			
42:20			
42:24			
43:3-5			
43:8			
43:10-12			
43:17			
46:2			
46:4-10			
46:14			
47:10-12			
47:16-17			
47:19-21	FRE 602		
47:24	FRE 602		

Exhibit B.1: Citibank's Deposition Designations

48:3-7			
51:10-12			
51:18-19			
51:21			
51:24-25			
52:2			
52:4			
52:7-8			
52:10			
52:12-16			
52:18			
52:20-24			
53:2			
53:4-7			
53:10-11			
53:13-14			
53:18			
54:19-25			
55:2-8		54:8-17	
55:17-19			
55:23-25			
56:25			
57:2-4			
57:6			
57:8-16			
57:20-23			
57:25			
58:2-3		224:6-226:10	
58:5-8		224:6-226:10	
58:10		224:6-226:10	
58:12-13		224:6-226:10	
58:15-16		224:6-226:10	
58:18-20		224:6-226:10	
58:22		224:6-226:10	
58:24-25		224:6-226:10	
59:10-11		59:15-24	
59:13		59:15-24	
60:9-14		59:15-24	
62:9-10		224:6-226:10	
62:12-13		224:6-226:10	
62:15-17		224:6-226:10	
62:19		224:6-226:10	
62:21-25		224:6-226:10	

Exhibit B.1: Citibank's Deposition Designations

63:2-7		224:6-226:10	
63:9-18		224:6-226:10	
63:20-22		224:6-226:10	
63:24-25		224:6-226:10	
64:2-14		224:6-226:10	
66:8-25	ID; FRE 802		
67:10-16	ID; FRE 802		
68:22-25	ID; FRE 802		
69:2-6	ID; FRE 802		
69:9-23	ID; FRE 802		
70:3-4			
70:6-12		70:13-16	
73:3-20		74:2-21; 214:21-215:3	
75:23-25		75:19-22	
76:2-4			
76:6-11			
76:17-23		76:24-77:7; 224:6-226:10	
78:8-13		76:24-77:7; 224:6-226:10	
78:15		76:24-77:7; 224:6-226:10	
78:17-20		76:24-77:7; 214:21-215:3; 224:6-226:10	
89:21-23			
89:25		214:21-215:3	
90:2-4		214:21-215:3	
90:6-8		214:21-215:3	
94:3-25	ID; FRE 802 (94:3-21)	93:13-24; 100:10-101:6	
95:2-24		96:16-97:6; 100:10-101:6	
99:16-21			
99:23			
99:25			
100:2-9			
101:7-25		100:10-101:6; 102:2-14; 103:10-105:5; 105:22-106:23; 107:8-108:13; 110:7-111:13; 116:4-13	

Exhibit B.1: Citibank's Deposition Designations

102:24-25		100:10-101:6; 102:2-14; 103:10-105:5; 105:22-106:23; 107:8-108:13; 110:7-111:13; 116:4-13	
103:2-3		102:16-22; 214:21-215:3	
103:5-8		102:16-22; 214:21-215:3	
121:20-25		122:8-17; 124:4-14; 127:23-129:6	
122:4-6		122:8-17; 124:4-14; 127:23-129:6	
122:18-21		122:8-17; 124:4-14; 127:23-129:6	
122:24-25		122:8-17; 124:4-14; 127:23-129:6	
123:2		122:8-17; 124:4-14; 127:23-129:6	
123:4-6		122:8-17; 124:4-14; 127:23-129:6	
123:9-11		122:8-17; 124:4-14; 127:23-129:6	
123:13-20		122:8-17; 124:4-14; 127:23-129:6	
123:23-25		122:8-17; 124:4-14; 127:23-129:6	
124:2		122:8-17; 124:4-14; 127:23-129:6	
124:16-20		122:8-17; 124:4-14; 127:23-129:6	
124:23-25		122:8-17; 124:4-14; 127:23-129:6	
125:2		122:8-17; 124:4-14; 127:23-129:6	
125:4-19		122:8-17; 124:4-14; 127:23-129:6	
125:22-23		122:8-17; 124:4-14; 127:23-129:6	
125:25		122:8-17; 124:4-14; 127:23-129:6	
126:2-3		122:8-17; 124:4-14; 127:23-129:6	
126:6-10		122:8-17; 124:4-14; 127:23-129:6	

Exhibit B.1: Citibank's Deposition Designations

126:12-13		122:8-17; 124:4-14; 127:23-129:6	
126:17-23		122:8-17; 124:4-14; 127:23-129:6	
127:2-4		122:8-17; 124:4-14; 127:23-129:6	
127:6		122:8-17; 124:4-14; 127:23-129:6	
127:9-10		122:8-17; 124:4-14; 127:23-129:6	
127:12-22		122:8-17; 124:4-14; 127:23-129:6	
133:8-10		130:7-132:16	
133:13		130:7-132:16	
133:15		130:7-132:16	
133:17-19		130:7-132:16	
133:21-22		130:7-132:16	
133:24-25		130:7-132:16	
134:2-3		130:7-132:16	
134:14-17		130:7-132:16	
134:20-25		130:7-132:16	
135:5-15		130:7-132:16	
135:19-21		130:7-132:16	
135:23-24		130:7-132:16	
136:2		130:7-132:16	
136:10-19			
139:4-6		140:2-5	
140:10-12		140:2-5	
140:15-25			
141:2-25			
142:2			
142:5			
142:7-21			
143:6-9		142:22-143:5	
143:11-12		142:22-143:5	
143:14-25		148:4-20; 149:13-23; 156:3-22	
144:2-24		148:4-20; 149:13-23; 156:3-22	
145:14-21		148:4-20; 149:13-23; 156:3-23	
145:23-25		148:4-20; 149:13-23; 156:3-24	

Exhibit B.1: Citibank's Deposition Designations

146:2-24		148:4-20; 149:13-23; 156:3-25	
147:2-8	A, MT (147:7-8)	148:4-20; 149:13-23; 156:3-26	
147:12-13	A, MT	148:4-20; 149:13-23; 156:3-27	
147:15-16		148:4-20; 149:13-23; 156:3-28	
147:18-21		148:4-20; 149:13-23; 156:3-29	
147:23		148:4-20; 149:13-23; 156:3-30	
148:21-25		148:4-20; 149:13-23; 156:3-31	
149:2-5	A, MT	148:4-20; 149:13-23; 156:3-32	
149:7-8	A, MT	148:4-20; 149:13-23; 156:3-33	
149:10-12	A, MT	148:4-20; 149:13-23; 156:3-34	
149:24-25	A, MT	148:4-20; 149:13-23; 156:3-35	
150:2	A, MT	148:4-20; 149:13-23; 156:3-36	
150:4	A, MT	148:4-20; 149:13-23; 156:3-37	
150:6-8	A, MT	148:4-20; 149:13-23; 156:3-38	
150:11-13	A, MT	148:4-20; 149:13-23; 156:3-39	
150:15-25	A, MT	148:4-20; 149:13-23; 156:3-40	
151:2-8	A, MT	148:4-20; 149:13-23; 156:3-41	
151:10-19	A, MT	148:4-20; 149:13-23; 156:3-42	
151:21-23	A, MT	148:4-20; 149:13-23; 156:3-43	
151:25	A, MT	148:4-20; 149:13-23; 156:3-44	
152:2-4	A, MT	148:4-20; 149:13-23; 156:3-45	
152:7-8	A, MT	148:4-20; 149:13-23; 156:3-46	
152:10-20	A, MT	148:4-20; 149:13-23; 156:3-47	

Exhibit B.1: Citibank's Deposition Designations

152:24-25	A, MT	148:4-20; 149:13-23; 156:3-48	
153:2-7	A, MT	148:4-20; 149:13-23; 156:3-49	
153:10-19		148:4-20; 149:13-23; 156:3-49	
153:22-24		148:4-20; 149:13-23; 156:3-49	
154:3		148:4-20; 149:13-23; 156:3-49	
154:7-8		148:4-20; 149:13-23; 156:3-49	
156:23-25	MT, V	148:4-20; 149:13-23; 156:3-49	
157:2-3		148:4-20; 149:13-23; 156:3-49	
157:5-6		148:4-20; 149:13-23; 156:3-49	
157:8-25		148:4-20; 149:13-23; 156:3-49	
158:2-3		148:4-20; 149:13-23; 156:3-49	
158:14-16		148:4-20; 149:13-23; 156:3-49	
158:19-21			
159:5-6			
159:8-12			
159:14-17			
160:15-18			
160:20-21			
160:23	FRE 602		
160:25	FRE 602		
161:2			
162:20-25			
163:2-4	FRE 401		
163:8-13	FRE 401		
168:10-15			
168:17-20			
171:3-18	MT (171:17-18)	171:19-20	
171:22-25		174:6-175:12	
172:2-6		174:6-175:12	
172:8-9		174:6-175:12	
172:11-14		174:6-175:12	
172:16-17		174:6-175:12	

Exhibit B.1: Citibank's Deposition Designations

172:19-24		174:6-175:12	
173:2		174:6-175:12	
173:4-12	MT (173:8-12)	174:6-175:12	
173:14-17		174:6-175:12	
173:19-24		174:6-175:12	
174:2-4		174:6-175:12	
175:20-25	MT (175:20-23)	174:6-175:12; 178:9-179:18; 195:11-16; 196:18-197:11	
176:2-5		178:9-179:18; 195:11-16; 96:18-197:11	
179:20-25		178:9-179:18	
180:2-10		178:9-179:18	
180:12		178:9-179:18	
185:6-7			
185:11-16			
185:19			
188:5-11	V, MT (188:9-11)	189:11-14	
188:14-15	V, MT	189:11-14	
188:17-19	IH, V, MT	189:11-14	
188:22	V, MT	189:11-14	
200:22-25			
201:2-3			
201:7-8			
202:21-25	FRE 501	201:22-202:19; 203:6-204:25	
203:4	FRE 501	201:22-202:19; 203:6-204:25	
210:13-15			
210:18-21			
210:24-25			
211:3-4			
211:8-10			
211:12			
211:15-16			
211:18-19			
211:22-23			
216:19-25			
217:2-8			
217:12-13			
217:17-19		217:24-218:7	
217:22		217:24-218:7	

Exhibit B.1: Citibank's Deposition Designations

218:23-25			
219:2-3			
219:8-11			
220:9-12			
220:15-16			
220:18-21			
220:24			
221:19-21			
221:24-25			
222:3-9			
222:12			
229:2-4		229:12-20	
229:7-8		229:12-20	
229:10		229:12-20	
231:25			
232:2-5			
232:14-18			
232:22-25			
233:2-3			
237:2-7			
237:13-25			
238:2-5		252:3-11	
238:12-13		252:3-11	
238:15-18		252:3-11	
240:25			
241:2-9			
241:20-25			
242:3-8			
243:13-20			
244:19-25			
245:2-12			
245:14-25			
246:2-5			
246:18-23			
247:2-4			
247:6-10			
247:14-19			
247:21-25			
248:2-6			
249:5-14			
249:18-20			
250:5-12			
250:15			

Exhibit B.1: Citibank's Deposition Designations

250:17-25			
251:2			
251:6			
252:3-11			
252:23-25			
253:2-3			
254:6-8	LC		
254:13-18	LC		
254:20	LC		
254:22-24	LC		
255:3-4	LC		
255:6-9	LC		
255:25	LC	259:10-20; 261:4-264:6	
256:2-3	LC	259:10-20; 261:4-264:6	
256:6-9	LC	259:10-20; 261:4-264:6	
256:11	LC	259:10-20; 261:4-264:6	
256:14-16	LC	259:10-20; 261:4-264:6	
259:7-9		259:10-20; 261:4-264:6	
260:4-11			
260:18-23			
260:25			
261:2			
263:16-20			
263:22			
263:24-25			
264:2-5			
267:6-17		259:10-20; 261:4-264:6	
267:19-23		259:10-20; 261:4-264:6	
268:3-17		259:10-20; 261:4-264:6	
271:11-13	LC	272:5-9	
271:17-19	LC	272:5-9	
271:21	LC	272:5-9	
272:19-25	LC	272:5-9	
273:4-5	LC	272:5-9	
273:7-9	LC	272:5-9	

Exhibit B.1: Citibank's Deposition Designations

273:12-13	LC	272:5-9	
273:15-16	LC	272:5-9	
273:19-24	LC	272:5-9	
274:3-4	LC	272:5-9	
274:6-7	LC	272:5-9	
274:10-12	LC	272:5-9	
276:10-11	LC	272:5-9	
276:14	LC	272:5-9	
277:2-4		272:5-9	
277:7		272:5-9	
277:15-24		272:5-9	
278:3-7		272:5-9	
278:9-10		272:5-9	
278:13-17		272:5-9	
278:19-25		272:5-9	
279:3-6		272:5-9	
285:5-9	LC	285:19-286:4	
285:12-17	LC	285:19-286:4	
286:21-25			
287:4			
288:12-14	LC	285:19-286:4	
288:17	LC	285:19-286:4	
288:19-23	LC	285:19-286:4	
289:2	LC	285:19-286:4	
289:19-21			
289:24-25			
290:3-5	AC; A		
290:9-10			
290:12-14			
290:19-23			
291:2-3	AC; A		
291:5-8	AC; A		
291:11	AC; A		

Exhibit B.1: Citibank's Deposition Designations

Deposition of John Greene (Bardin Hill 30(b)(6)), dated October 23, 2020

Citibank's Designations	Defendants' Objections to Citibank's Designations	Defendants' Counter-Designations	Citibank's Objections to Defendants' Counter-Designations
8:15-19			
8:25			
9:2-22	FRE 401		
10:4-14	FRE 401		
11:5-21	FRE 401		
12:20-25			
13:2-23			
15:20-25	FRE 401		
16:2-25	FRE 401		
17:2-12	FRE 401		
20:5-15			
24:13-25			
25:2-6			
27:7-9			
27:14-15			
33:22-25	LC	34:17-35:4; 36:6-18	
34:3-15	LC	34:17-35:4; 36:6-18	
35:6-9	LC	34:17-35:4; 36:6-18	
35:14-20	LC	34:17-35:4; 36:6-18	
62:9-22			
63:13-17			
67:24-25			
68:2-4			
68:7-9			
68:11-24			
69:2-8			
70:14-18	FRE 802		
74:12-25			
77:9-20			
78:4-25			
79:2-15			
80:22-25			
81:2-16		81:17-82:23; 85:20-22	
84:16-19		81:17-82:23; 85:20-22	

Exhibit B.1: Citibank's Deposition Designations

84:22-25		81:17-82:23; 85:20-22	
85:2-9		81:17-82:23; 85:20-22	
85:14-19		81:17-82:23; 85:20-22	
92:17-20		92:21-93:2	
96:11-22	FRE 802		
102:11-25			
103:2-7			
106:18-25		107:19-108:11; 110:22-11:7	
107:2-4		107:19-108:11; 110:22-11:7	
107:12-18		107:19-108:11; 110:22-11:7	
108:22-25		107:19-108:11; 110:22-11:7	
109:2-9		107:19-108:11; 110:22-11:7	
112:8-12		107:19-108:11; 110:22-11:7	
129:18-22			
129:24-25			
130:2-19		130:21-24	
130:25		130:21-24	
131:2-6			
133:23-25			
134:2-6		136:13-137:11	
134:15-25		136:13-137:11	
135:2-12		136:13-137:11	
137:12-14		136:13-137:11	
139:22-25		137:15-21; 138:19-139:8	
140:2-7		137:15-21; 138:19-139:8	
140:9-15		137:15-21; 138:19-139:8	
142:12-21	AC; A	137:15-21; 138:19-139:8	
142:23-24	AC; A	137:15-21; 138:19-139:8	
152:20-25			
153:2			

Exhibit B.1: Citibank's Deposition Designations

153:11-25		155:16-156:11	
154:2-7		155:16-156:11	

Exhibit B.1: Citibank's Deposition Designations

Deposition of Jeffrey Frusciante (Brigade 30(b)(6)), dated October 22, 2020

Citibank's Designations	Defendants' Objections to Citibank's Designations	Defendants' Counter-Designations	Citibank's Objections to Defendants' Counter-Designations
9:11-13			
9:20-21			
26:3-25			
27:2-9			
31:17-25			
32:2-20			
33:3-25			
34:2-8			
36:15-25			
37:2-11			
37:13-25			
38:2-14			
40:12-14			
40:20-25			
41:2-12		41:15-16	
41:18-25		41:15-16	
42:2-6			
49:15-21			
53:13-17		50:17-22; 52:20-53:2; 53:23-54:17; 57:11-58:4; 58:21-59:18; 64:22-65:5; 66:3-67:12; 69:6-25	
53:20-22		50:17-22; 52:20-53:2; 53:23-54:17; 57:11-58:4; 58:21-59:18; 64:22-65:5; 66:3-67:12; 69:6-25	
54:18-21		50:17-22; 52:20-53:2; 53:23-54:17; 57:11-58:4; 58:21-59:18; 64:22-65:5; 66:3-67:12; 69:6-25	
54:24-25		50:17-22; 52:20-53:2; 53:23-54:17; 57:11-58:4; 58:21-59:18; 64:22-65:5; 66:3-67:12; 69:6-25	

Exhibit B.1: Citibank's Deposition Designations

56:6-8		50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
56:11-25		50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
57:2-10		50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
58:5-9		50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
58:12		50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
58:14-15		50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
62:13-17	MT	50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
62:20-21	MT	50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
63:20-25	AC; A	50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	

Exhibit B.1: Citibank's Deposition Designations

64:2-3		50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
64:5-21		50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
65:13-17		50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
65:19-25		50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
66:2		50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
67:13-17	MT	50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
67:19-25		50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
68:2-21		50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
68:23-25		50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	

Exhibit B.1: Citibank's Deposition Designations

69:2-5		50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
70:2-6		50:17-22; 52:20-53:2; 53:23-54:17; 57:11- 58:4; 58:21-59:18; 64:22-65:5; 66:3- 67:12; 69:6-25	
72:2-12		72:13-17	
79:10-25		81:17-25; 82:7-24	
80:2		81:17-25; 82:7-24	
80:12-25		81:17-25; 82:7-24; 118:14-25; 121:9- 124:23	
81:2-6		81:17-25; 82:7-24; 118:14-25; 121:9- 124:23	
81:11-16		81:17-25; 82:7-24; 118:14-25; 121:9- 124:23	
82:25		83:24-84:12; 93:5- 95:13	
83:2-9		83:24-84:12; 93:5- 95:13	
84:13-19			
87:9-13			
102:8-12		93:5-95:13	
103:17-24			
104:23-25		93:5-95:13	
105:2-23		93:5-95:13	
106:14-24		108:18-24	
107:13-25		108:18-24	
108:2-6		108:18-24	
108:8-11		108:18-24	
112:8-19		112:19-113:17	
116:20-23		114:4-116:19	
116:25		114:4-116:19	
117:2		114:4-116:19	
117:20-25		117:3-19	
118:7-13		114:4-116:19; 117:3- 19	
128:21-25			

Exhibit B.1: Citibank's Deposition Designations

129:2-4			
132:5-25			
133:2-5			
133:10-23		134:4-8; 136:16-21	
137:23-25			
138:2-10			
139:7-25			
140:2-25			
141:2			
141:23-25	MT		
142:2-3	MT		
142:5-8			
142:12-20			
143:3-13			
143:20-25			
144:2-25			
145:2-15			
145:17-20			
146:10-24			
147:2-4		147:6-148:8; 160:2-161:10	
148:9-25		147:6-148:8; 160:2-161:10; 253:24-255:18	
149:2-3		147:6-148:8; 160:2-161:10	
156:12-20		160:2-161:10; 162:3-18; 165:20-166:14; 169:17-170:9; 185:3-13; 186:17-189:2; 190:9-191:12	
162:19-25		160:2-161:10; 162:3-18; 165:20-166:14; 169:17-170:9; 185:3-13; 186:17-189:2; 190:9-191:12	
163:2-4		160:2-161:10; 162:3-18; 165:20-166:14; 169:17-170:9; 185:3-13; 186:17-189:2; 190:9-191:12	
163:16-18			

Exhibit B.1: Citibank's Deposition Designations

164:3-14		160:2-161:10; 162:3-18; 165:20-166:14; 169:17-170:9; 185:3-13; 186:17-189:2; 190:9-191:12	
194:14-21		196:25-197:13; 198:7-16	
195:20-22		196:25-197:13; 198:7-16	
195:25		196:25-197:13; 198:7-16	
196:2-4		196:25-197:13; 198:7-16	
196:7-11		196:25-197:13; 198:7-16	
196:14-18		196:25-197:13; 198:7-16	
196:21-24		196:25-197:13; 198:7-16	
198:17-20		196:25-197:13; 198:7-16	
198:22		196:25-197:13; 198:7-16	
199:4-10		199:11-200:8; 200:12-17; 200:23-201:8	
200:9-11		199:11-200:8; 200:12-17; 200:23-201:8	
200:18-22		199:11-200:8; 200:12-17; 200:23-201:8	
202:6-10		199:11-200:8; 200:12-17; 200:23-201:8	
205:13-25			
206:2-15			
207:10-15			
208:24-25			
209:2-18			
209:20-25			
210:2-15		210:16-24; 214:9-20	
210:25		210:16-24; 214:9-20	
211:2-11			
215:23-25			

Exhibit B.1: Citibank's Deposition Designations

216:2-5			
216:19-25			
217:2-18			
218:23-25			
219:2-25		210:16-24; 214:9-20; 220:11-22	
220:2-7		210:16-24; 214:9-20; 220:11-22	
220:23-25		210:16-24; 214:9-20; 220:11-22	
221:2-25		210:16-24; 214:9-20; 220:11-22	
222:2-14			
223:21-25	MT		
224:2-19	MT	226:4-24	
227:15-25	MT		
228:2-9	MT		
228:19-25	MT	226:4-24	
229:2-15	MT	226:4-24	
230:20-25			
231:2-7			
231:13-25			
232:2-7			
232:9-18			
233:13-23		236:13-237:21; 253:24-255:18	
234:8-14		236:13-237:21; 253:24-255:18	
235:14-20		236:13-237:21;	
237:22-24		236:13-237:21;	
238:4-11			
238:14			
238:21-25			
239:2-10			
240:5-25		236:13-237:21; 241:2-8	
242:2	IH		
243:9-13	A, AC	236:13-237:21; 241:2-8; 242:11- 243:9	
243:15-25		236:13-237:21; 241:2-8; 242:11- 243:9	

Exhibit B.1: Citibank's Deposition Designations

244:2		236:13-237:21; 241:2-8; 242:11- 243:9	
244:5-13	A, AC	236:13-237:21; 241:2-8; 242:11- 243:9	
245:13-22		236:13-237:21; 241:2-8; 242:11- 243:9	
250:18-21		247:7-250:17; 251:18-252:17	
250:24-25		247:7-250:17; 251:18-252:17	
251:2-3		247:7-250:17; 251:18-252:17	
251:5-17			
255:19-25	A, AC	253:24-255:18	
256:2-7	A, AC	253:24-255:18	
256:16-25	A, AC	253:24-255:18	
257:2	A, AC	253:24-255:18	
257:6-7	A, AC	253:24-255:18	
257:14-25	A, AC		
258:2			
258:8-19	A, AC		
279:20-25		282:4-12; 283:19- 284:3	
280:2		282:4-12; 283:19- 284:3	
286:4-8		282:4-12; 283:19- 284:3	
295:14-16			
295:18-22			
295:25			
296:3-9			
296:12-14			
296:16-20			
296:22			

Exhibit B.1: Citibank's Deposition Designations

Deposition of Matthew Perkal (Brigade 30(b)(6)), dated October 22, 2020

Citibank's Designations	Defendants' Objections to Citibank's Designations	Defendants' Counter-Designations	Citibank's Objections to Defendants' Counter-Designations
9:3-5			
14:10-25			
15:2-12			
15:24-25			
16:2			
18:18-21			
19:17-23		19:24-20:4	
20:5-15			
20:19-25			
21:2-9			
21:15-16		21:17-22:7; 23:15-22; 26:3-8	
22:8-21		21:17-22:7; 22:22-23; 23:15-22; 26:3-8	
22:24-25		21:17-22:7; 22:22-23; 23:15-22; 26:3-8	
23:2-7		21:17-22:7; 22:22-23; 23:15-22; 26:3-8	
23:23-25		21:17-22:7; 23:15-22; 26:3-8	
24:2-9		21:17-22:7; 23:15-22; 26:3-8	

Exhibit B.1: Citibank's Deposition Designations

24:14-20		21:17-22:7; 23:15-22; 26:3-8	
30:9-25			
31:2-22	MT (31:15-22)		
31:24-25			
32:2-21	FRE 401 (32:18-21)	32:23-33:2; 33:9-14	
33:3-8	FRE 401	32:23-33:2; 33:9-14	
37:13-25	FRE 401 (37:13-23)	32:23-33:2; 33:9-14	
38:2-25			
39:11-21			
44:20-25		45:2	
45:3-10	FRE 802	47:3-8; 48:5-17; 49:4-7; 49:9-25; 50:2-3; 52:2-8; 53:4- 14; 55:20-56:3	
45:12	FRE 802	47:3-8; 48:5-17; 49:4-7; 49:9-25; 50:2-3; 52:2-8; 53:4- 14; 55:20-56:3	
45:22-25	FRE 802	47:3-8; 48:5-17; 49:4-7; 49:9-25; 50:2-3; 52:2-8; 53:4- 14; 55:20-56:3	
46:2	FRE 802	47:3-8; 48:5-17; 49:4-7; 49:9-25; 50:2-3; 52:2-8; 53:4- 14; 55:20-56:3	
62:21-25	FRE 401	63:5;64:12-19	
63:2-4	FRE 401	63:5;64:12-19	
64:24-25	V	65:6	

Exhibit B.1: Citibank's Deposition Designations

65:2-5	V	65:6	
65:7-15	V		
66:7-25			
67:2-18	F (67:17-18)	67:19-20	
67:21-25	F (67:21-23)	67:19-20	
68:2-13		68:14-18	
68:19-25		68:14-18	
69:2-12	FRE 602 (69:9-12)		
69:18-25			
70:2-3			
74:20-25	V	35:21-36:5; 36:15-37:2; 75:3-14	
75:2	V	35:21-36:5; 36:15-37:2; 75:3-14	
75:15-22	FRE 602	35:21-36:5; 36:15-37:2; 75:9-14	
78:2-7		34:12-21	
79:12-16		34:12-21; 79:17-25	
82:15-25			
83:2-12			
87:7-14	FRE 602	84:23-86:11	
88:16-25			
89:2-19			
101:19-25			
102:2-7	V(102:3-7)		
102:10-25	V(102:10-11)	103:13-19	

Exhibit B.1: Citibank's Deposition Designations

103:2-12		103:13-19	
103:20-25		103:13-19	
104:2-6		103:13-19	

Exhibit B.1: Citibank's Deposition Designations

Deposition of Steven Abrams (Greywolf 30(b)(6)), dated October 21, 2020

Citibank's Designations	Defendants' Objections to Citibank's Designations	Defendants' Counter-Designations	Citibank's Objections to Defendants' Counter-Designations
7:15-17			
17:2-6			
17:23-25			
18:12-18			
22:3-14		22:15-18; 23:11-25:13	
22:19-25		22:15-18; 23:11-25:13; 27:17-28:5; 28:23-29:6; 30:13-33:2; 34:21-35:4; 35:11-23; 36:14-37:3; 37:9-10; 40:10-13	23:11-25:13 - FRE 602 27:17-28:5 - A 30:13-33:2 - FRE 602 37:9-10 - Incomplete Designation
23:2-10	FRE 802	22:15-18; 23:11-25:13; 27:17-28:5; 28:23-29:6; 30:13-33:2; 34:21-35:4; 35:11-23; 36:14-37:6; 37:9-18; 40:10-13	23:11-25:13 - FRE 602 27:17-28:5 - A 30:13-33:2 - FRE 602
26:9-25	FRE 602	22:15-18; 23:11-25:13; 27:17-28:5; 28:23-29:6; 30:13-33:2; 34:21-35:4; 35:11-23; 36:14-37:6; 37:9-18; 40:10-13	23:11-25:13 - FRE 602 27:17-28:5 - A 30:13-33:2 - FRE 602
27:2-16	FRE 602	22:15-18; 23:11-25:13; 27:17-28:5; 28:23-29:6; 30:13-33:2; 34:21-35:4; 35:11-23; 36:14-37:6; 37:9-18; 40:10-13	23:11-25:13 - FRE 602 27:17-28:5 - A 30:13-33:2 - FRE 602

Exhibit B.1: Citibank's Deposition Designations

28:6-22		22:15-18; 23:11-25:13; 27:17-28:5; 28:23-29:6; 30:13-33:2; 34:21-35:4; 35:11-23; 36:14-37:6; 37:9-18; 40:10-13	23:11-25:13 - FRE 602 27:17-28:5 - A 30:13-33:2 - FRE 602
29:7-25	FRE 802	22:15-18; 23:11-25:13; 27:17-28:5; 28:23-29:6; 30:13-33:2; 34:21-35:4; 35:11-23; 36:14-37:6; 37:9-18; 40:10-13	23:11-25:13 - FRE 602 27:17-28:5 - A 30:13-33:2 - FRE 602
30:2-12		22:15-18; 23:11-25:13; 27:17-28:5; 28:23-29:6; 30:13-33:2; 34:21-35:4; 35:11-23; 36:14-37:6; 37:9-18; 40:10-13	23:11-25:13 - FRE 602 27:17-28:5 - A 30:13-33:2 - FRE 602
32:5-14		22:15-18; 23:11-25:13; 27:17-28:5; 28:23-29:6; 30:13-33:2; 34:21-35:4; 35:11-23; 36:14-37:6; 37:9-18; 40:10-13	23:11-25:13 - FRE 602 27:17-28:5 - A 30:13-33:2 - FRE 602
33:7-25	FRE 602; V	22:15-18; 23:11-25:13; 27:17-28:5; 28:23-29:6; 30:13-33:2; 34:21-35:4; 35:11-23; 36:14-37:6; 37:9-18; 40:10-13	23:11-25:13 - FRE 602 27:17-28:5 - A 30:13-33:2 - FRE 602
34:2-20	FRE 602; V	22:15-18; 23:11-25:13; 27:17-28:5; 28:23-29:6; 30:13-33:2; 34:21-35:4; 35:11-23; 36:14-37:6; 37:9-18; 40:10-13	23:11-25:13 - FRE 602 27:17-28:5 - A 30:13-33:2 - FRE 602
35:5-10	FRE 602; V	22:15-18; 23:11-25:13; 27:17-28:5; 28:23-29:6; 30:13-33:2; 34:21-35:4;	23:11-25:13 - FRE 602 27:17-28:5 - A 30:13-33:2 - FRE 602

Exhibit B.1: Citibank's Deposition Designations

		35:11-23; 36:14-37:6; 37:9-18; 40:10-13	
42:16-20	FRE 602; CD	42:21-43:6	
50:9-21	FRE 802	48:22-49:18; 50:22-51:6; 52:10-13; 52:18-53:12; 53:25-54:2-13; 62:20-66:5; 67:22-69:5; 70:5-72:12; 73:17-20; 75:24-77:9	48:22-49:18 - FRE 802 70:5-72:12 - FRE 602 73:17-20 - Incomplete Designation
51:7-22		48:22-49:18; 50:22-51:6; 52:10-13; 52:18-53:12; 53:25-54:2-13; 62:20-66:5; 67:22-69:5; 70:5-72:12; 73:17-20; 75:24-77:9	48:22-49:18 - FRE 802 70:5-72:12 - FRE 602 73:17-20 - Incomplete Designation
52:5-9	V	48:22-49:18; 50:22-51:6; 52:10-13; 52:18-53:12; 53:25-54:2-13; 62:20-66:5; 67:22-69:5; 70:5-72:12; 73:17-20; 75:24-77:9	48:22-49:18 - FRE 802 70:5-72:12 - FRE 602 73:17-20 - Incomplete Designation
53:13-24	FRE 602; V	48:22-49:18; 50:22-51:6; 52:10-13; 52:18-53:12; 53:25-54:2-13; 62:20-66:5; 67:22-69:5; 70:5-72:12; 73:17-20; 75:24-77:9	48:22-49:18 - FRE 802 70:5-72:12 - FRE 602 73:17-20 - Incomplete Designation
54:14-25		48:22-49:18; 50:22-51:6; 52:10-13; 52:18-53:12; 53:25-54:2-13; 62:20-66:5; 67:22-69:5; 70:5-72:12; 73:17-20; 75:24-77:9	48:22-49:18 - FRE 802 70:5-72:12 - FRE 602 73:17-20 - Incomplete Designation

Exhibit B.1: Citibank's Deposition Designations

55:2-4		48:22-49:18; 50:22-51:6; 52:10-13; 52:18-53:12; 53:25-54:2-13; 62:20-66:5; 67:22-69:5; 70:5-72:12; 73:17-20; 75:24-77:9	48:22-49:18 - FRE 802 70:5-72:12 - FRE 602 73:17-20 - Incomplete Designation
66:6-9	CD; IH; V; FRE 602	48:22-49:18; 50:22-51:6; 52:10-13; 52:18-53:12; 53:25-54:2-13; 62:20-66:5; 67:22-69:5; 70:5-72:12; 73:17-20; 75:24-77:9	48:22-49:18 - FRE 802 70:5-72:12 - FRE 602 73:17-20 - Incomplete Designation
66:12-18	CD; IH; V; FRE 602	48:22-49:18; 50:22-51:6; 52:10-13; 52:18-53:12; 53:25-54:2-13; 62:20-66:5; 67:22-69:5; 70:5-72:12; 73:17-20; 75:24-77:9	48:22-49:18 - FRE 802 70:5-72:12 - FRE 602 73:17-20 - Incomplete Designation
69:6-25	LC	48:22-49:18; 50:22-51:6; 52:10-13; 52:18-53:12; 53:25-54:2-13; 62:20-66:5; 67:22-69:5; 70:5-72:12; 73:17-20; 75:24-77:9	48:22-49:18 - FRE 802 70:5-72:12 - FRE 602 73:17-20 - Incomplete Designation
70:2-4	LC	48:22-49:18; 50:22-51:6; 52:10-13; 52:18-53:12; 53:25-54:2-13; 62:20-66:5; 67:22-69:5; 70:5-72:12; 73:17-20; 75:24-77:9	48:22-49:18 - FRE 802 70:5-72:12 - FRE 602 73:17-20 - Incomplete Designation
73:23-25		48:22-49:18; 50:22-51:6; 52:10-13; 52:18-53:12; 53:25-54:2-13; 62:20-66:5; 67:22-69:5; 70:5-	48:22-49:18 - FRE 802 70:5-72:12 - FRE 602 73:17-20 - Incomplete Designation

Exhibit B.1: Citibank's Deposition Designations

		72:12; 73:17-20; 75:24-77:9	
74:2-25		48:22-49:18; 50:22-51:6; 52:10-13; 52:18-53:12; 53:25-54:2-13; 62:20-66:5; 67:22-69:5; 70:5-72:12; 73:17-20; 75:24-77:9	48:22-49:18 - FRE 802 70:5-72:12 - FRE 602 73:17-20 - Incomplete Designation
75:2-12		48:22-49:18; 50:22-51:6; 52:10-13; 52:18-53:12; 53:25-54:2-13; 62:20-66:5; 67:22-69:5; 70:5-72:12; 73:17-20; 75:24-77:9	48:22-49:18 - FRE 802 70:5-72:12 - FRE 602 73:17-20 - Incomplete Designation
83:14-21	V; FRE 602	83:22-84:6	
84:7-18	V	83:22-84:6	
86:12-22		22:15-18; 23:11-25:13; 27:17-28:5; 28:23-29:6; 30:13-33:2; 34:21-35:4; 35:11-23; 36:14-37:6; 37:9-18; 40:10-13	23:11-25:13 - FRE 602 27:17-28:5 - A 30:13-33:2 - FRE 602
88:10-20		22:15-18; 23:11-25:13; 27:17-28:5; 28:23-29:6; 30:13-33:2; 34:21-35:4; 35:11-23; 36:14-37:6; 37:9-18; 40:10-13	23:11-25:13 - FRE 602 27:17-28:5 - A 30:13-33:2 - FRE 602
92:17-25		22:15-18; 23:11-25:13; 27:17-28:5; 28:23-29:6; 30:13-33:2; 34:21-35:4; 35:11-23; 36:14-37:6; 37:9-18; 40:10-13	23:11-25:13 - FRE 602 27:17-28:5 - A 30:13-33:2 - FRE 602

Exhibit B.1: Citibank's Deposition Designations

93:2-8	V	22:15-18; 23:11-25:13; 27:17-28:5; 28:23-29:6; 30:13-33:2; 34:21-35:4; 35:11-23; 36:14-37:6; 37:9-18; 40:10-13	23:11-25:13 - FRE 602 27:17-28:5 - A 30:13-33:2 - FRE 602
97:10-25	FRE 602	94:23-97:9	FRE 802
98:2-12	FRE 602	94:23-97:9	FRE 802
106:11-25	LC; ID; V; FRE 802	102:10-104:16; 109:8-24; 110:5-18; 111:9-25; 113:4-13; 114:6-18; 115:4-117:18	110:5-18 - FRE 602
107:2-25	LC; ID; V; FRE 802	102:10-104:16; 109:8-24; 110:5-18; 111:9-25; 113:4-13; 114:6-18; 115:4-117:18	110:5-18 - FRE 602
108:2-25	LC; ID; V; FRE 802	102:10-104:16; 109:8-24; 110:5-18; 111:9-25; 113:4-13; 114:6-18; 115:4-117:18	110:5-18 - FRE 602
109:2-7	LC; ID; V; FRE 802	102:10-104:16; 109:8-24; 110:5-18; 111:9-25; 113:4-13; 114:6-18; 115:4-117:18	110:5-18 - FRE 602
109:25	FRE 602; V; CD	102:10-104:16; 109:8-24; 110:5-18; 111:9-25; 113:4-13; 114:6-18; 115:4-117:18	110:5-18 - FRE 602
110:2-5	FRE 602; V; CD	102:10-104:16; 109:8-24; 110:5-18; 111:9-25; 113:4-13; 114:6-18; 115:4-117:18	110:5-18 - FRE 602

Exhibit B.1: Citibank's Deposition Designations

110:19-25	MT; FRE 602	102:10-104:16; 109:8-24; 110:5-18; 111:9-25; 113:4-13; 114:6-18; 115:4- 117:18	110:5-18 - FRE 602
111:2-8	MT; FRE 602	102:10-104:16; 109:8-24; 110:5-18; 111:9-25; 113:4-13; 114:6-18; 115:4- 117:18	110:5-18 - FRE 602
112:4-25	FRE 602; V	102:10-104:16; 109:8-24; 110:5-18; 111:9-25; 113:4-13; 114:6-18; 115:4- 117:18	110:5-18 - FRE 602
113:2-3	FRE 602; V	102:10-104:16; 109:8-24; 110:5-18; 111:9-25; 113:4-13; 114:6-18; 115:4- 117:18	110:5-18 - FRE 602
113:14-25		102:10-104:16; 109:8-24; 110:5-18; 111:9-25; 113:4-13; 114:6-18; 115:4- 117:18	110:5-18 - FRE 602
114:2-5		102:10-104:16; 109:8-24; 110:5-18; 111:9-25; 113:4-13; 114:6-18; 115:4- 117:18	110:5-18 - FRE 602
117:19-25		22:15-18; 23:11- 25:13; 27:17-28:5; 28:23-29:6; 30:13- 33:2; 34:21-35:4; 35:11-23; 36:14-37:6; 37:9-18; 40:10-13	23:11-25:13 - FRE 602 27:17-28:5 - A 30:13-33:2 - FRE 602
118:2-3		22:15-18; 23:11- 25:13; 27:17-28:5; 28:23-29:6; 30:13- 33:2; 34:21-35:4;	23:11-25:13 - FRE 602

Exhibit B.1: Citibank's Deposition Designations

		35:11-23; 36:14-37:6; 37:9-18; 40:10-13	27:17-28:5 - A 30:13-33:2 - FRE 602
119:19-25	MT; LC	120:10-121:2	
120:2-9	MT; LC	120:10-121:2	

Exhibit B.1: Citibank's Deposition Designations

Deposition of Michael Josephson (Greywolf 30(b)(6)), dated October 21, 2020

Citibank's Designations	Defendants' Objections to Citibank's Designations	Defendants' Counter-Designations	Citibank's Objections to Defendants' Counter-Designations
10:2-4			
23:18-25		22:22-23:2; 23:14-17; 24:22-25:17; 35:4-10; 35:19-36:16; 39:11	22:22-23:2; 23:14-17 - A
24:2-21		22:22-23:2; 23:14-17; 24:22-25:17; 35:4-10; 35:19-36:16; 39:11	22:22-23:2; 23:14-17 - A
25:18-23		22:22-23:2; 23:14-17; 24:22-25:17; 35:4-10; 35:19-36:16; 39:11	22:22-23:2; 23:14-17 - A
28:16-25	FRE 602	22:22-23:2; 23:14-17; 24:22-25:17; 35:4-10; 35:19-36:16; 39:11	22:22-23:2; 23:14-17 - A
29:2-8	FRE 602	22:22-23:2; 23:14-17; 24:22-25:17; 35:4-10; 35:19-36:16; 39:11	22:22-23:2; 23:14-17 - A
36:17-25	IH; MT; FRE 602; CD	22:22-23:2; 23:14-17; 24:22-25:17; 35:4-10; 35:19-36:16; 39:11	22:22-23:2; 23:14-17 - A
37:2-10	IH; MT; FRE 602; CD	22:22-23:2; 23:14-17; 24:22-25:17; 35:4-10; 35:19-36:16; 39:11	22:22-23:2; 23:14-17 - A
38:10-25	FRE 602; V	22:22-23:2; 23:14-17; 24:22-25:17; 35:4-10; 35:19-36:16; 39:11	22:22-23:2; 23:14-17 - A
39:2-10	MT; V; FRE 602	22:22-23:2; 23:14-17; 24:22-25:17; 35:4-10; 35:19-36:16; 39:11	22:22-23:2; 23:14-17 - A

Exhibit B.1: Citibank's Deposition Designations

39:12-25	MT; V; FRE 602	22:22-23:2; 23:14-17; 24:22-25:17; 35:4-10; 35:19-36:16; 39:11	22:22-23:2; 23:14-17 - A
45:6-25	ID; CD; FRE 602	35:4-10; 35:19-36:16; 40:19-45-5; 46:3-25	
46:2	ID; CD; FRE 602	35:4-10; 35:19-36:16; 40:19-45-5; 46:3-25	
47:2-22	V; FRE 602; MT; CD	35:4-10; 35:19-36:16; 40:19-45-5; 46:3-25	
50:21-25	ID	35:4-10; 35:19-36:16; 40:19-45-5; 46:3-25; 54:24-55:15; 56:6- 57:9; 58:7-20; 59:14- 60:2; 61:11-62:8	
51:2-25	ID	35:4-10; 35:19-36:16; 40:19-45-5; 46:3-25; 54:24-55:15; 56:6- 57:9; 58:7-20; 59:14- 60:2; 61:11-62:8	
52:2-25	ID; FRE 602	35:4-10; 35:19-36:16; 40:19-45-5; 46:3-25; 54:24-55:15; 56:6- 57:9; 58:7-20; 59:14- 60:2; 61:11-62:8	
53:2-25	ID; MT; FRE 602	35:4-10; 35:19-36:16; 40:19-45-5; 46:3-25; 54:24-55:15; 56:6- 57:9; 58:7-20; 59:14- 60:2; 61:11-62:8	
54:2-23	ID; MT; FRE 602	35:4-10; 35:19-36:16; 40:19-45-5; 46:3-25; 54:24-55:15; 56:6- 57:9; 58:7-20; 59:14- 60:2; 61:11-62:8	
55:19-25	FRE 602	35:4-10; 35:19-36:16; 40:19-45-5; 46:3-25; 54:24-55:15; 56:6-	

Exhibit B.1: Citibank's Deposition Designations

		57:9; 58:7-20; 59:14-60:2; 61:11-62:8	
56:2-5	FRE 602	35:4-10; 35:19-36:16; 40:19-45-5; 46:3-25; 54:24-55:15; 56:6-57:9; 58:7-20; 59:14-60:2; 61:11-62:8	
57:10-25	FRE 602	35:4-10; 35:19-36:16; 40:19-45-5; 46:3-25; 54:24-55:15; 56:6-57:9; 58:7-20; 59:14-60:2; 61:11-62:8	
58:2-6	FRE 602	35:4-10; 35:19-36:16; 40:19-45-5; 46:3-25; 54:24-55:15; 56:6-57:9; 58:7-20; 59:14-60:2; 61:11-62:8	
58:21-25		35:4-10; 35:19-36:16; 40:19-45-5; 46:3-25; 54:24-55:15; 56:6-57:9; 58:7-20; 59:14-60:2; 61:11-62:8	
59:2-13		35:4-10; 35:19-36:16; 40:19-45-5; 46:3-25; 54:24-55:15; 56:6-57:9; 58:7-20; 59:14-60:2; 61:11-62:8	
60:3-25		35:4-10; 35:19-36:16; 40:19-45-5; 46:3-25; 54:24-55:15; 56:6-57:9; 58:7-20; 59:14-60:2; 61:11-62:8	
61:2-8	FRE 802	35:4-10; 35:19-36:16; 40:19-45-5; 46:3-25; 54:24-55:15; 56:6-57:9; 58:7-20; 59:14-60:2; 61:11-62:8	

Exhibit B.1: Citibank's Deposition Designations

67:3-16		61:11-17; 61:23-62:8; 67:17-20	
70:5-13	FRE 602	68:13-70:4; 71:17- 72:14;	
72:15-25	FRE 802	68:13-70:4; 71:17- 72:14;	
73:2-14	FRE 602; FRE 802	68:13-70:4; 71:17- 72:14;	
77:2-25	FRE 602	35:4-10; 35:19-36:16; 75:17-76:4; 78:17- 81:16; 84:16-21; 86:18-88:12; 89:13- 19; 91:7-18; 93:10- 94:4	84:16-21 - A
78:2-16		35:4-10; 35:19-36:16; 75:17-76:4; 78:17- 81:16; 84:16-21; 86:18-88:12; 89:13- 19; 91:7-18; 93:10- 94:4	84:16-21 - A
83:8-25		35:4-10; 35:19-36:16; 75:17-76:4; 78:17- 81:16; 84:16-21; 86:18-88:12; 89:13- 19; 91:7-18; 93:10- 94:4	84:16-21 - A
84:2-15	FRE 602	35:4-10; 35:19-36:16; 75:17-76:4; 78:17- 81:16; 84:16-21; 86:18-88:12; 89:13- 19; 91:7-18; 93:10- 94:4	84:16-21 - A
84:22-25	FRE 602	35:4-10; 35:19-36:16; 75:17-76:4; 78:17- 81:16; 84:16-21; 86:18-88:12; 89:13- 19; 91:7-18; 93:10- 94:4	84:16-21 - A

Exhibit B.1: Citibank's Deposition Designations

85:2-25	FRE 802; LC	35:4-10; 35:19-36:16; 75:17-76:4; 78:17- 81:16; 84:16-21; 86:18-88:12; 89:13- 19; 91:7-18; 93:10- 94:4	84:16-21 - A
86:2-17	FRE 602; LC	35:4-10; 35:19-36:16; 75:17-76:4; 78:17- 81:16; 84:16-21; 86:18-88:12; 89:13- 19; 91:7-18; 93:10- 94:4	84:16-21 - A
87:10-17	LC	35:4-10; 35:19-36:16; 75:17-76:4; 78:17- 81:16; 84:16-21; 86:18-88:12; 89:13- 19; 91:7-18; 93:10- 94:4	84:16-21 - A
88:15-24	LC	35:4-10; 35:19-36:16; 75:17-76:4; 78:17- 81:16; 84:16-21; 86:18-88:12; 89:13- 19; 91:7-18; 93:10- 94:4	84:16-21 - A
89:3-12	LC	35:4-10; 35:19-36:16; 75:17-76:4; 78:17- 81:16; 84:16-21; 86:18-88:12; 89:13- 19; 91:7-18; 93:10- 94:4	84:16-21 - A
103:8-25	FRE 602; FRE 802	35:4-10; 35:19-36:16; 102:6-103:7; 105:11- 24; 106:18-108:2; 108:16-110:16; 111:21-114:4;	
104:2-3	FRE 602; FRE 802	35:4-10; 35:19-36:16; 102:6-103:7; 105:11- 24; 106:18-108:2; 108:16-110:16; 111:21-114:4;	

Exhibit B.1: Citibank's Deposition Designations

104:21-25		35:4-10; 35:19-36:16; 102:6-103:7; 105:11-24; 106:18-108:2; 108:16-110:16; 111:21-114:4;	
105:2-10		35:4-10; 35:19-36:16; 102:6-103:7; 105:11-24; 106:18-108:2; 108:16-110:16; 111:21-114:4;	
105:25	ID; FRE 602	35:4-10; 35:19-36:16; 102:6-103:7; 105:11-24; 106:18-108:2; 108:16-110:16; 111:21-114:4;	
106:2-17	ID; FRE 602	35:4-10; 35:19-36:16; 102:6-103:7; 105:11-24; 106:18-108:2; 108:16-110:16; 111:21-114:4;	
108:3-15	ID; FRE 602	35:4-10; 35:19-36:16; 102:6-103:7; 105:11-24; 106:18-108:2; 108:16-110:16; 111:21-114:4;	
110:17-25		35:4-10; 35:19-36:16; 102:6-103:7; 105:11-24; 106:18-108:2; 108:16-110:16; 111:21-114:4;	
111:2-21	FRE 602	35:4-10; 35:19-36:16; 102:6-103:7; 105:11-24; 106:18-108:2; 108:16-110:16; 111:21-114:4;	
114:5-13		114:18-20; 117:7-120:5; 122:5-124:18; 125:18-126:16;	130:15-24 - Incomplete Designation

Exhibit B.1: Citibank's Deposition Designations

		127:2-7; 128:3-16; 130:15-24	
114:21-25		114:18-20; 117:7- 120:5; 122:5-124:18; 125:18-126:16; 127:2-7; 128:3-16; 130:15-24	130:15-24 - Incomplete Designation
115:2-12		114:18-20; 117:7- 120:5; 122:5-124:18; 125:18-126:16; 127:2-7; 128:3-16; 130:15-24	130:15-24 - Incomplete Designation
120:6-10	FRE 602	114:18-20; 117:7- 120:5; 122:5-124:18; 125:18-126:16; 127:2-7; 128:3-16; 130:15-24	130:15-24 - Incomplete Designation
125:9-17	FRE 602	114:18-20; 117:7- 120:5; 122:5-124:18; 125:18-126:16; 127:2-7; 128:3-16; 130:15-24	130:15-24 - Incomplete Designation
126:17-25		114:18-20; 117:7- 120:5; 122:5-124:18; 125:18-126:16; 127:2-7; 128:3-16; 130:15-24	130:15-24 - Incomplete Designation
127:8-12		114:18-20; 117:7- 120:5; 122:5-124:18; 125:18-126:16; 127:2-7; 128:3-16; 130:15-24	130:15-24 - Incomplete Designation
129:3-25	FRE 802	114:18-20; 117:7- 120:5; 122:5-124:18; 125:18-126:16; 127:2-7; 128:3-16; 130:15-24	130:15-24 - Incomplete Designation

Exhibit B.1: Citibank's Deposition Designations

130:2-14	FRE 602	114:18-20; 117:7-120:5; 122:5-124:18; 125:18-126:16; 127:2-7; 128:3-16; 130:15-24	130:15-24 - Incomplete Designation
135:6-25	V; FRE 602	133:11-21; 134:2-135:5; 136:15-138:11; 139:20-140:9; 141:9-16; 143:4-20; 144:18-145:3; 145:17-146:3; 146:15-149:4	
136:2-13	FRE 602	133:11-21; 134:2-135:5; 136:15-138:11; 139:20-140:9; 141:9-16; 143:4-20; 144:18-145:3; 145:17-146:3; 146:15-149:4	
138:12-16	FRE 602	133:11-21; 134:2-135:5; 136:15-138:11; 139:20-140:9; 141:9-16; 143:4-20; 144:18-145:3; 145:17-146:3; 146:15-149:4	
138:22-25		133:11-21; 134:2-135:5; 136:15-138:11; 139:20-140:9; 141:9-16; 143:4-20; 144:18-145:3; 145:17-146:3; 146:15-149:4	
139:2-19	FRE 602	133:11-21; 134:2-135:5; 136:15-138:11; 139:20-140:9; 141:9-16; 143:4-20; 144:18-145:3; 145:17-146:3; 146:15-149:4	

Exhibit B.1: Citibank's Deposition Designations

140:10-25	FRE 802	133:11-21; 134:2-135:5; 136:15-138:11; 139:20-140:9; 141:9-16; 143:4-20; 144:18-145:3; 145:17-146:3; 146:15-149:4	
141:2-8		133:11-21; 134:2-135:5; 136:15-138:11; 139:20-140:9; 141:9-16; 143:4-20; 144:18-145:3; 145:17-146:3; 146:15-149:4	
143:21-22		133:11-21; 134:2-135:5; 136:15-138:11; 139:20-140:9; 141:9-16; 143:4-20; 144:18-145:3; 145:17-146:3; 146:15-149:4	
144:2-17		133:11-21; 134:2-135:5; 136:15-138:11; 139:20-140:9; 141:9-16; 143:4-20; 144:18-145:3; 145:17-146:3; 146:15-149:4	
145:4-16		133:11-21; 134:2-135:5; 136:15-138:11; 139:20-140:9; 141:9-16; 143:4-20; 144:18-145:3; 145:17-146:3; 146:15-149:4	
146:8-14		133:11-21; 134:2-135:5; 136:15-138:11; 139:20-140:9; 141:9-16; 143:4-20; 144:18-	

Exhibit B.1: Citibank's Deposition Designations

		145:3; 145:17-146:3; 146:15-149:4	
149:5-10		133:11-21; 134:2- 135:5; 136:15- 138:11; 139:20- 140:9; 141:9-16; 143:4-20; 144:18- 145:3; 145:17-146:3; 146:15-149:4	
153:6-21	FRE 602	152:2-153:5; 153:22- 155:18; 156:9- 157:11; 159:6-160:9; 160:17-23; 163:2-14;	
157:12-25	ID; FRE 802; FRE 602	152:2-153:5; 153:22- 155:18; 156:9- 157:11; 159:6-160:9; 160:17-23; 163:2-14;	
158:2-25	ID; FRE 802; FRE 602	152:2-153:5; 153:22- 155:18; 156:9- 157:11; 159:6-160:9; 160:17-23; 163:2-14;	
159:2-5	ID; FRE 802; FRE 602	152:2-153:5; 153:22- 155:18; 156:9- 157:11; 159:6-160:9; 160:17-23; 163:2-14;	
162:16-25	LC	152:2-153:5; 153:22- 155:18; 156:9- 157:11; 159:6-160:9; 160:17-23; 163:2-14;	
167:23-25	AF; V	35:4-10; 35:19-36:16; 165:10-24; 168:25- 169:20;	
168:2-14	AF; V	35:4-10; 35:19-36:16; 165:10-24; 168:25- 169:20;	

Exhibit B.1: Citibank's Deposition Designations

169:21-25	ID; FRE 602	35:4-10; 35:19-36:16; 165:10-24; 168:25- 169:20;	
170:2-3	ID; FRE 602	35:4-10; 35:19-36:16; 165:10-24; 168:25- 169:20; 170:6-10	
170:11-25	ID; FRE 602	35:4-10; 35:19-36:16; 165:10-24; 168:25- 169:20; 170:6-10	
171:2-12	ID; FRE 602	35:4-10; 35:19-36:16; 165:10-24; 168:25- 169:20; 170:6-10	

Exhibit B.1: Citibank's Deposition Designations

Deposition of Scott Crocombe (HPS 30(b)(6)), dated October 20, 2020

Citibank's Designations	Defendants' Objections to Citibank's Designations	Defendants' Counter-Designations	Citibank's Objections to Defendants' Counter-Designations
7:14-16			
7:24-25			
8:2-8			
16:9-15			
17:4-11			
23:15-20			
24:10-25		25:16-26:9; 28:6-23	
25:2-15		25:16-26:9; 28:6-23	
27:20-25		25:16-26:9; 28:6-23	
28:2-5		25:16-26:9; 28:6-23	
29:4-25		25:16-26:9; 28:6-23	
30:2-20		25:16-26:9; 28:6-23	
39:21-25			
40:2-25			
41:2-22	FRE 602 (41:15-22)		
44:24-25			
45:2-11			
46:6-25			
47:2-8			
48:19-25			

Exhibit B.1: Citibank's Deposition Designations

49:2-7			
49:13-25			
50:2-6	FRE 501		
50:19-25	FRE 501		
51:2	FRE 501		
59:22-25			
60:2-25			
61:2-19			
72:25	FRE 602; FRE 401	72:13-24	
73:2-25	FRE 602 (73:2-10); FRE 401	72:13-24	
74:2-24	FRE 401 (74:2-9)		
75:7-19	FRE 401; AF (75:15-19)		
75:24-25	AF		
76:2-17	AF		

Exhibit B.1: Citibank's Deposition Designations

Deposition of George Xanthakys (HPS 30(b)(6)), dated October 20, 2020

Citibank's Designations	Defendants' Objections to Citibank's Designations	Defendants' Counter-Designations	Citibank's Objections to Defendants' Counter-Designations
8:5-11			
7:21-23			
17:2-25			
18:2-13			
19:5-10			
25:16-25		26:2-3	
33:6-25		34:2-6	
34:7-25		34:2-6	
35:2-5		35:6-16	
41:17-25		41:3-16	
42:2-9			
42:14-25		42:10-13	
43:2-24		43:25-44:20	
46:12-25			
47:2-25			
48:2-5			
49:16-25		53:7-22	
50:2-25		53:7-22	
51:2-25		53:7-22	
52:2-25		53:7-22	

Exhibit B.1: Citibank's Deposition Designations

53:2-6		53:7-22	
54:2-25		55:2-7	
55:10-24			
57:10-14		57:15-20	
57:21-25			
58:2-12		58:13-15	
58:16-25	FRE 602 (58:16-20)	58:13-15	
59:2-25			
60:2-14			
60:18-21			
65:16-25			
66:2-25		224:16-25; 225:2-7; 225:10-19	
67:2-14		224:16-25; 225:2-7; 225:10-19	
69:20-25			
70:2-10			
70:17-25	FRE 602	70:11-16	
71:2-25	FRE 602 (71:2)	70:11-16	
72:3-25		72:2	
73:2-6			
73:22-25			
74:2-3			
74:8-11		74:12-19	
74:20-25		74:12-19	

Exhibit B.1: Citibank's Deposition Designations

75:2-7		75:8-12	
75:13-25		75:8-12	
76:2-18			
77:4-12		77:13-15	
77:16-25		77:13-15	
78:2-6		78:7-25	
79:8-20		79:21-24	
79:25		79:21-24	
80:2-25			
81:2-25			
82:2-25			
83:2-12			
85:2-25		86:5-9	
86:2-4		86:5-9	
86:10-25			
87:2-25			
88:2-25			
89:2-13			
89:17-25		89:14-16	
90:2-15			
90:20-24		90:16-19	
91:3-7		90:25-91:2	
92:4-23		91:22-92:3; 92:24-93:12	
93:13-25			

Exhibit B.1: Citibank's Deposition Designations

94:2-13			
94:19-25			
95:2-14			
95:22-25		95:15-21	
96:2-15		95:15-21	
96:22-25			
97:2-24		97:25; 98:2-8	
98:13-24			
100:13-20		100:3-12	
102:19-25		103:2	
103:3-10		103:11-24	
103:25		103:11-24	
104:2-9		103:11-24	
106:21-25		106:20	
107:2-13		107:14	
107:15-20	A	107:14	
109:18-25		108:25-109:9; 110:19-111:3	
110:2-5		108:25-109:9; 110:19-111:3	
111:17-25			
112:2-9			
114:13-25			
115:2-25			
116:5-25		116:2-4	

Exhibit B.1: Citibank's Deposition Designations

117:2-6			
117:8-12		117:8; 117:13-15	
117:16-25		117:13-15	
118:2-25			
119:2-24			
120:3-10		120:20-121:3	
120:13-29		120:20-121:3	
121:4-25			
122:19-25			
123:2-25			
124:2-15		124:16-21	
124:22-25		124:16-21	
125:2-25			
126:2-25			
127:2-25			
128:2-4			
128:12-15			
129:6-25			
130:2-25			
131:2-8			
133:6-9		133:10-16	
133:17-25		133:10-16	
134:2-7			
134:11-25			

Exhibit B.1: Citibank's Deposition Designations

135:2-25			
136:2-7		136:8-14	
136:15-25		136:8-14	
137:2-25			
138:2-25			
139:2-25		224:16-25; 225:2-7; 225:10-19	
140:2-25			
141:2-25			
142:2			
142:6-10			
142:13-25			
143:2-3			
143:5-25			
144:2-25		224:16-25; 225:2-7; 225:10-19	
145:2-5			
151:20-23			
152:2-25			
153:2-25			
154:2-25			
155:2-25			
156:2-25			
157:2-9			
159:16-25			

Exhibit B.1: Citibank's Deposition Designations

160:2-3			
160:11-25			
161:2-25			
162:2-17			
162:23-25			
163:2-25		224:16-25; 225:2-7; 225:10-19	
164:2-25			
165:2-25		166:2-11	
169:24-25			
170:2-8			
170:11-18			
171:9-25			
172:2-25			
173:2-25			
174:2-25			
175:2-8			
180:5-16			
180:19-25			
181:2-9			
181:12-25			
182:2-21			
182:24-25			
183:2-25			
184:2-8			

Exhibit B.1: Citibank's Deposition Designations

184:10-25			
185:2-13			
185:25		185:14-21	
186:2-5		185:14-21	
186:12-25		185:14-21	
187:2-25		185:14-21	
188:2-25		185:14-21; 224:16-25; 225:2-7; 225:10-19	
189:2-12		185:14-21	
189:14-25			
190:2-25		191:25	
191:5-25			
192:2			
192:9-25			
193:2-7		193:8-14	
193:15-24		193:8-14	
194:6-12			
194:18-25			
195:2-25			
196:2-15			
213:19-25			
214:2-25			
215:2-20			
222:2-8			

Exhibit B.1: Citibank's Deposition Designations

222:14-25			
223:2-24			

Exhibit B.1: Citibank's Deposition Designations

Deposition of Jeremy Phipps (Medalist 30(b)(6)), dated October 12, 2020

Citibank's Designations	Defendants' Objections to Citibank's Designations	Defendants' Counter-Designations	Citibank's Objections to Defendants' Counter-Designations
10:16-18			
10:25			
11:2-3			
11:12-14			
24:22-25			
25:9-12			
25:16-25			
26:16-22		26:23-25; 27:2-9	
27:9-22		26:23-25; 27:2-9	
32:22-25			
33:2			
33:13-20		33:21-25	
34:16-18		34:3-9; 34:11-2; 34:14	
38:15-25		34:3-9; 34:11-2; 34:14	
39:2-24			
40:7-21			
40:23-25			
41:2-4			
42:15-19		42:20-23	

Exhibit B.1: Citibank's Deposition Designations

42:23-25		42:20-23	
43:2-10			
43:23-25			
44:2-10		44:11-16	
47:11-25			
48:2-3			
49:14-25	FRE 602		
50:2-25	FRE 602		
51:2-25	FRE 602		
52:2-4	FRE 602		
55:16-25			
56:2-13		56:14-16; 56:18	
57:21-25	30(b)(6)	57:4-8; 57:15-20	
58:2-6	30(b)(6)		
58:8-13			
58:18-24			
60:11-25			
61:2-14	FRE 602		
61:16-19	FRE 602		
61:21-25			
62:2-25			
63:3-5			
63:7-25			
64:2-25			

Exhibit B.1: Citibank's Deposition Designations

65:9-12		65:13	
65:15-17			
66:10-25			
67:2-19			
68:2-9			
68:14-25			
69:2-12			
84:7-25		83:11-25; 84:2, 84:5	
85:2-3			
91:14-25			
92:2-16		93:7-18	
93:25			
94:2-4			
94:10-12		94:7-8	
95:13-16			
95:24-25		95:22-23	
96:2			
96:10-25			
97:2-12		97:13-16; 18-20	
98:6-9		98:10-16	
98:17-21			
100:19-21			
100:24-25			
101:2-6			

Exhibit B.1: Citibank's Deposition Designations

101:8-10			
101:12			
101:14-23			
102:15-22			
103:20-24			
104:3-5		103:25; 104:2	
105:10-14			
112:2-25	MT (112:23-25)	113:4-5	
113:2-3	MT (113:2-3)	113:4-5	
113:6-10			
113:22-25			
115:5-21			
116:2			
116:5-16		116:3-4	
117:7-25			
118:2-25			
119:2-11			
119:13-25			
120:2-19		120:21	
121:2-7		120:23-25	
122:10-18			
123:11-20		125:13-16	
123:22-25			
126:3-11			

Exhibit B.1: Citibank's Deposition Designations

128:2-21			
129:6-19			
131:4-11			
131:13-22			
131:24-25			
132:2			
132:4-5			
133:7-22	LC		
134:14-18	LC	134:19	
134:20	LC		
136:23-24	AC		
137:6-15			
138:24-25			
139:2			
147:2-25			
148:2-3			
148:12-17			
148:24-25			
149:2-16	LC		
150:2-25			
151:2-8			
151:14-25			
152:2-5			
167:19-25			

Exhibit B.1: Citibank's Deposition Designations

168:2-9			
168:11-20			
168:25			
169:2-4			
169:6-25			
170:8-11			
171:3-7			
173:17-25			
174:2-13			
174:20-25			
182:16-25			
183:2-25			
184:2-25	FRE 602		
188:21-25			
189:2-5			
190:16-25			
191:3-4			
191:6-8			
192:11-25	FRE 401		
193:2-8	FRE 401		
193:11	FRE 401		
194:25		195:24-194:12	
195:2-15		195:24-194:12	
195:20		195:24-194:12	

Exhibit B.1: Citibank's Deposition Designations

195:24-25		195:24-194:12	
196:2-14		195:24-194:12	
196:21-25		195:24-194:12	
197:2-16		195:24-194:12	
197:19-22	30(b)(6)	195:24-194:12; 197:17-18	
205:24-25			
206:2-6			
206:11-24			
208:4-15			
208:20-25			
209:2-25			
210:2-8		210:9-13	
210:14-20			
210:22-25		210:21-22	
211:2-9			
214:21-25			
215:8-10			
215:15-20		215:21-24	
217:7-12		216:16-21	
217:18-25			
218:2-25			
219:2-5			
222:10-25			
223:2-25			

Exhibit B.1: Citibank's Deposition Designations

224:2-7			
238:16-24		237:9-25; 238:2-15	
258:18-22			

Exhibit B.1: Citibank's Deposition Designations

Deposition of Darren Beals (New Generation 30(b)(6)), dated October 9, 2020

Citibank's Designations	Defendants' Objections to Citibank's Designations	Defendants' Counter-Designations	Citibank's Objections to Defendants' Counter-Designations
7:16-18			
7:25			
8:19-22			
9:9-12			
13:22-24			
14:5			
14:15-25			
15:2-12			
15:14-25			
16:2-12			
16:14-25			
17:2-3			
17:6-25			
18:2-22			
21:3-6	CD	21:7	
21:7-11			
23:4-15			
23:18-24			
25:24-25			
30:3		29:17-25	

Exhibit B.1: Citibank's Deposition Designations

32:9-12			
33:6-9			
35:3-6	30(b)(6)	35:7-8	
35:9-10	30(b)(6)		
36:2-3			
36:7			
36:13-16			
36:21			
37:4-8			
37:25			
38:2-4			
38:7-13			
38:15			
38:25			
39:2-17	MT; CD	39:18	
39:19-25			
40:2			
40:8-15			
42:23-25			
43:2-5			
43:8			
43:10-13			
44:3-6			
44:16-25			

Exhibit B.1: Citibank's Deposition Designations

45:2-18	CD	45:19-20	
45:21-25			
46:2-7			
46:15-21			
49:5-13	AF	49:5-13	
49:15-25			
50:2-5	CD; AF	50:6	
50:8-9	CD; AF	50:10-11	
50:12			
50:20-25			
52:10-25			
53:2-23			
55:3-7			
55:17-20			
56:18-22			
56:25			
57:2-7	CD	57:8-9	
57:11-25			
58:2-14			
58:18-25			
59:2-5			
61:16-18			
62:3-12			
62:15-19			

Exhibit B.1: Citibank's Deposition Designations

62:21-25			
63:2-17		63:18-64:7	
64:15-22			
65:16-23		66:2-6	
66:7-25			
67:2-8			
67:17-22			
68:2-7	AF; CD	68:8	
68:10-11			
74:10-23			
74:25			
75:2-10			
75:13-24			
76:2-18			
77:19-25		77:12-18	
78:2-14			
78:22-25			
79:2-21			
80:3-8			
80:11			
80:15-21			
80:24-25			
81:2-5			
81:7-25	FRE 501	82:2-4	

Exhibit B.1: Citibank's Deposition Designations

82:8-24	FRE 602		
86:25			
87:2-17			
87:25			
88:2-8			
90:7-25			
93:5-21	AF	93:22	
93:23-24			
94:11-25			
95:4-7			
98:3-18	30(b)(6); AF; FRE 602	98:19-20	
98:21	30(b)(6); AF; FRE 602		
101:5-24	30(b)(6)	101:25-102:2	
102:5-19	30(b)(6)	102:20-21	
102:23-25	30(b)(6)		
104:16-22			

Exhibit B.1: Citibank's Deposition Designations

Deposition of Frederick Dent (New Generation 30(b)(6)), dated October 9, 2020

Citibank's Designations	Defendants' Objections to Citibank's Designations	Defendants' Counter-Designations	Citibank's Objections to Defendants' Counter-Designations
7:10-20			
8:3-21			
11:5-15	FRE 401; FRE 403; V; AF; LC; 30(b)(6)	10:23-11:4; 11:16-12:12	
13:18-24			
14:2-5			
14:8-17			
14:20-25			
16:14-17			
16:21			
16:24-25		16:22-23	
17:2-12			
18:2-4			
18:9-15			
18:19-25			
19:2-5		19:5-6	
19:7-25			
20:2-25			
21:2-25			
22:2-5			
22:7-9	FRE 501		

Exhibit B.1: Citibank's Deposition Designations

24:4-25		23:6-24:2	
25:2-14			
26:4-11	FRE 501; AC; AF; CD	26:12-13	
26:14-25			
27:2-10			
27:13-25			
28:2-20			
29:8-25			
34:23-25			
35:9-13			
35:18-25			
36:2-4	LC	36:5-7	
36:8			
37:8-24			
38:2-8			
38:15-16	AF	38:17-19	
38:20-25			
39:2-22			
41:12-19			
41:22-25			
42:2			
42:7-13			

Exhibit B.1: Citibank's Deposition Designations

Deposition of Eric Warren (Revlon 30(b)(6)), dated October 23, 2020

Citibank's Designations	Defendants' Objections to Citibank's Designations	Defendants' Counter-Designations	Citibank's Objections to Defendants' Counter-Designations
8:25			
9:2-3			
15:5-11			
44:24-25			
45:2-6			
141:2-8		140:24-25	
142:7-25		143:2-16; 174:7-21; 179:21-180:5	
143:2-16			
144:15-25			
145:2-10			
145:19-25			
146:2-25			
147:2-25			
148:2-8	FRE 802 (148:6-8)		
148:11-17	FRE 802		
148:20-25			
150:4-5			
150:9-22			
151:3-24		150:23-151:2	
154:15-25		50:13-18; 50:22-23; 52:10-14; 52:17-19; 59:7-12; 59:14-19, 59:22-25; 60:2-9; 63:22-64:3; 64:5-9; 81:19-82:2; 82:6- 83:4; 180:17-19; 180:22-181:6, 181:9	
155:2-25		50:13-18; 50:22-23; 52:10-14; 52:17-19; 59:7-12; 59:14-19, 59:22-25; 60:2-9; 63:22-64:3; 64:5-9; 81:19-82:2; 82:6- 83:4; 180:17-19; 180:22-181:6, 181:9	

Exhibit B.1: Citibank's Deposition Designations

156:2-21		50:13-18; 50:22-23; 52:10-14; 52:17-19; 59:7-12; 59:14-19, 59:22-25; 60:2-9; 63:22-64:3; 64:5-9; 81:19-82:2; 82:6- 83:4; 180:17-19; 180:22-181:6, 181:9	
157:2-25		50:13-18; 50:22-23; 52:10-14; 52:17-19; 59:7-12; 59:14-19, 59:22-25; 60:2-9; 63:22-64:3; 64:5-9; 81:19-82:2; 82:6- 83:4; 180:17-19; 180:22-181:6, 181:9	
158:2-25		50:13-18; 50:22-23; 52:10-14; 52:17-19; 59:7-12; 59:14-19, 59:22-25; 60:2-9; 63:22-64:3; 64:5-9; 81:19-82:2; 82:6- 83:4; 180:17-19; 180:22-181:6, 181:9	
159:2-25		50:13-18; 50:22-23; 52:10-14; 52:17-19; 59:7-12; 59:14-19, 59:22-25; 60:2-9; 63:22-64:3; 64:5-9; 81:19-82:2; 82:6- 83:4; 180:17-19; 180:22-181:6, 181:9	
160:2-25		50:13-18; 50:22-23; 52:10-14; 52:17-19; 59:7-12; 59:14-19, 59:22-25; 60:2-9; 63:22-64:3; 64:5-9; 81:19-82:2; 82:6- 83:4; 180:17-19; 180:22-181:6, 181:9	
161:2-21		50:13-18; 50:22-23; 52:10-14; 52:17-19; 59:7-12; 59:14-19, 59:22-25; 60:2-9; 63:22-64:3; 64:5-9; 81:19-82:2; 82:6-	

Exhibit B.1: Citibank's Deposition Designations

		83:4; 180:17-19; 180:22-181:6, 181:9	
162:3-15			
163:21-25			
164:2-15			
164:20-25			
165:2-7			
165:19-25			
166:2-4			
166:11-22		50:13-18; 50:22-23; 52:10-14; 52:17-19; 59:7-12; 59:14-19, 59:22-25; 60:2-9; 63:22-64:3; 64:5-9; 81:19-82:2; 82:6- 83:4; 180:17-19; 180:22-181:6, 181:9	
169:7-25			
170:2-23		143:2-16; 179:21- 180:2, 180:5	
171:8-12			
171:14-25			
173:7-14		40:19-41:10; 41:19- 42:8; 84:20-24	

Exhibit B.1: Citibank's Deposition Designations

Deposition of Scott Caraher (Symphony 30(b)(6)), dated October 16, 2020

Citibank's Designations	Defendants' Objections to Citibank's Designations	Defendants' Counter-Designations	Citibank's Objections to Defendants' Counter-Designations
7:6-8			
7:17-21			
13:4-10			
32:19-33:5			
33:10-34:9			
34:18-35:15		34:10-15	
36:16-37:20	LC		
38:25-40:5	LC	40:6-41:6	Non-Responsive Answer
41:7-42:6	FRE 401		
42:15-18	FRE 401		
42:22-25			
43:12-44:19	FRE 401		

Exhibit B.1: Citibank's Deposition Designations

Deposition of John Vaughan (Symphony (30(b)(6)), dated October 16, 2020

Citibank's Designations	Defendants' Objections to Citibank's Designations	Defendants' Counter-Designations	Citibank's Objections to Defendants' Counter-Designations
11:24-12:2			
12:13-15			
26:18-27:14			
54:12-16	FRE 802		
54:20-55:23	FRE 802		
61:3-9	FRE 401	76:3-15; 78:2-16	
61:21-62:6	FRE 401	76:3-15; 78:2-16	
62:8-10	FRE 401	76:3-15; 78:2-16	
62:12-17	FRE 401	76:3-15; 78:2-16	
62:20-25	FRE 401	76:3-15; 78:2-16	
63:3-8	FRE 401	76:3-15; 78:2-16	
63:10-17	FRE 401	76:3-15; 78:2-16	
63:19-25	FRE 401	76:3-15; 78:2-16	
64:3-5	FRE 401	76:3-15; 78:2-16	
65:18-24	FRE 401	76:3-15; 78:2-16	
66:12-13	FRE 401	76:3-15; 78:2-16	
66:15-18	FRE 401	76:3-15; 78:2-16	
66:20-23	FRE 401	76:3-15; 78:2-16	
66:25-67:2	FRE 401	76:3-15; 78:2-16	
68:16-69:5	FRE 401	76:3-15; 78:2-16	
69:7-69:12	FRE 401	76:3-15; 78:2-16	
69:17-70:6	FRE 401	76:3-15; 78:2-16	
70:8-13	FRE 401	76:3-15; 78:2-16	
70:15-21	FRE 401	76:3-15; 78:2-16	
70:24-71:9	FRE 401	76:3-15; 78:2-16	
80:13-22			
80:24-81:5			
81:7-11			
81:13-16			
81:18-81:18			
81:24-82:13			
82:16-83:8			
83:10-83:10			
97:20-22			
97:24-97:24			
104:5-105:12	FRE 802		

Exhibit B.1: Citibank's Deposition Designations

115:18-117:12	FRE 802		
118:4-119:7			
131:19-133:8			
200:20-202:10			
224:20-225:21	FRE 802		
227:2-228:5	FRE 401; FRE 802		

Exhibit B.1: Citibank's Deposition Designations

Deposition of William Lenga (Tall Tree 30(b)(6)), dated October 14, 2020

Citibank's Designations	Defendants' Objections to Citibank's Designations	Defendants' Counter-Designations	Citibank's Objections to Defendants' Counter-Designations
11:19-20			
13:23-25			
14:2-3			
30:3-4			
30:8-12			
30:20-25			
31:13-14			
31:16-18			
31:21-24			
32:5-10			
32:25			
33:2-8			
33:19-21			
34:10-25			
35:2-23			
36:19-24			
37:2-3			
39:13-16			
39:22-25			
40:2			
40:9-24		40:25-41:3; 41:7-41:14	
42:4-15			
44:4-12	30(b)(6)		
45:17-19			
45:23-25			
46:2-16			
47:14-15			
47:18-20			
49:3-9			
50:14-25			
51:2-3			
52:12-16			
52:19-20			
53:9-25	30(b)(6); V; 401	52:22-53:8	
54:4-7	30(b)(6); V; 401		

Exhibit B.1: Citibank's Deposition Designations

54:17-18	30(b)(6); V; 401	54:8-16; 54:19	
54:20-25	30(b)(6); V; 401		
55:2-18			
59:10-13			
59:22-23	30(b)(6); 401; AF; FRE 602	59:24-25	
60:4			
60:6-7	30(b)(6); 401; AF; FRE 602	60:8-9	
60:10-25	30(b)(6); 401; AF; FRE 602	61:2-4	
61:5-7	30(b)(6); 401; AF; FRE 602		
61:9-11			
61:14-17			
61:22-25			
63:10-12		62:23-63:9	
64:12-19			
67:12-25	LC		
68:2	LC		
68:5-11	LC		
68:13-23	LC		
68:25	LC		
69:2-6			
70:11-14	30(b)(6); V; LC	70:15-18	
70:19-24	30(b)(6); V; LC		
71:3-5			
71:7-10	30(b)(6); V; LC	71:11-13	
71:14-17	30(b)(6); V; LC		
71:19-21	30(b)(6)		
71:25	30(b)(6); V; LC	72:5	
72:2-4	30(b)(6); V; LC	72:5	
72:6	30(b)(6); V; LC	72:5; 73:3-17	
72:13-15			
74:2			
74:4-6			
74:8-14			
74:24-25	30(b)(6); V; 401		
75:2-18			
80:7-13	V; LC	80:15-81:3	
81:5-14	30(b)(6); 401; CD		
82:5-11	30(b)(6); 401; AF; FRE 602	82:12-13	

Exhibit B.1: Citibank's Deposition Designations

82:14-16	30(b)(6); 401; AF; FRE 602; LC		
82:18-22			
83:19-24	30(b)(6); 401; AF; FRE 602		
84:3-25	30(b)(6); 401; AF; FRE 602; LC		
85:2-9	30(b)(6); 401; AF; FRE 602; LC		
86:9-13	30(b)(6); 401; FRE 602	88:2-89:8; 90:20-91:3	
92:3-18	30(b)(6); 401; AF; FRE 602; LC		
94:4-5			
94:15-23	30(b)(6)		
95:15-16			
95:23			
96:9-20	30(b)(6)		
97:3-17	30(b)(6); CD	96:21-97:2	
97:20-25			
98:2-11			
98:14-17			
98:19			
98:21-25			
99:2			
108:5-8	AF; V	99:7-19; 102:15- 104:2; 104:15-105:5; 105:9-15	
108:10-12		108:14-21	
108:25			
109:2-4			
109:6-7			
109:9-12			
109:14			
109:16-19			
109:22-25			
110:2-8			
110:24-25	AF; V; CD		
111:2-4	AF; V; CD		
111:6-8			
111:10-13			
111:19-23			
112:4-17		132:4-136:3; 136:5- 137:10	

Exhibit B.1: Citibank's Deposition Designations

112:25	30(b)(6); 401; AF; FRE 602		
113:2-4	30(b)(6); 401; AF; FRE 602	113:5-8	
113:9-11	30(b)(6); 401; AF; FRE 602		
113:13-15	30(b)(6); 401; AF; FRE 602	113:16	
113:17-19	30(b)(6); 401; AF; FRE 602		
113:21-23	30(b)(6); 401; AF; FRE 602		
114:2-3	30(b)(6); 401; AF; FRE 602		
114:5-11	30(b)(6); 401; AF; FRE 602; CD	114:12-13	
114:15-16	30(b)(6); 401; AF; FRE 602		
114:18-21	30(b)(6); 401; AF; FRE 602		
117:5-7			
117:16-22			
118:10-13			
118:25			
119:2-6			
119:18-21			
119:25			
120:3			
120:9-11			
120:15-25			
121:2			
121:10-15	MT	121:16	
121:17-18	MT		
121:20-24			
122:2			
122:23-24			
123:5-9		123:10-13	
124:9-14			
124:16-25			
125:2-7		125:11-126:5; 126:11-18	
126:20-23	FRE 602; LC	126:24	
126:25	FRE 602; LC		
127:2-6	FRE 602; LC		

Exhibit B.1: Citibank's Deposition Designations

127:12-16	FRE 602; LC		
128:8-11	MT	128:12	
128:13-14	MT		
128:16-17	CD; V	128:18	
128:19-22			
128:24-25			
129:6			
129:10-11			
131:7-9			
131:12			
131:14-16			
131:19			
131:21-23			
132:2			
138:2-6			
138:9			
138:11-14			
138:17			
138:19-21			
138:24-25			
139:2-3			
139:5-7			
139:10-24			
140:2-18		140:19-20; 167:9-168:9; 171:7-173:5; 174:10-25; 175:2-7; 176:9-23; 177:3-178:7	
146:3-5			
146:11-13			
146:15			
147:4-13			
147:22-25			
148:2-3			
148:11-25			
149:2-3			
149:9-18			
149:21-22			
149:24-25			
150:2-9			
150:11-14			
150:16-22			
150:24			

Exhibit B.1: Citibank's Deposition Designations

151:2-10	AF; V; FRE 602	151:11	
151:12-16	FRE 602		
151:18-21			
151:24-25			
152:3-6			
152:8			
152:19-25	AF; CD; FRE 602	153:2	
153:3-5	FRE 602		
153:7-18			
153:20-22			
153:24-25	FRE 602		
154:2-3	FRE 602	154:4-8; 154:15-25; 155:3-6; 155:8-23	
156:24-25			
157:2-25			
158:2-25			
159:2-15			
159:17			
159:19-25	LC		
160:2-3	LC	160:4-5	
160:7-11	CD	160:12	
160:13-16			
160:18-25			
161:2-5			
161:7-10			
161:12-17			
161:20			
161:22-25	LC		
162:2	LC	162:3-4	
162:5-10	LC		
162:15-25			
163:2-4			
197:19-25			
198:2-5			
198:22-25			
199:7-12	FRE 802; 30(b)(6); FRE 602	199:13-14	
199:16-24	FRE 802		
200:3-10	FRE 802		
200:13-14	FRE 802		
200:16-18	FRE 802	200:19-20	
200:21			
200:23-25			

Exhibit B.1: Citibank's Deposition Designations

201:4			
201:12-13	FRE 602; 30(b)(6); FRE 401	201:14-15	
201:16-17	FRE 602; FRE 401		
201:19-20	FRE 602; FRE 401		
201:23	FRE 602; FRE 401		
201:25	A; FRE 401	202:4	
202:2-3	FRE 401		
202:5	FRE 401		
202:7-9	FRE 401	202:10	
202:11	FRE 401		
202:13-16	FRE 401		
202:23-25	FRE 401; FRE 802; FRE 602; V		
203:2	FRE 401; FRE 802; FRE 602; V	203:3	
203:4	FRE 401		
203:6-8	MT; A; FRE 401; FRE 403	203:9	
203:10			
203:12-14	A; FRE 401; FRE 403	203:15	
203:16-17			
204:3-13	FRE 802; FRE 602	204:14-15	
204:16-17	FRE 602; FRE 802		
204:19-20	FRE 602; FRE 802	204: 21-22	
204:23-24	FRE 602		
205:3-13	CD	205:14	
205:15			
205:23-25			
206:3			
206:5-8			
206:10-13			
206:15-18			
206:20-21		207:19-24; 208:7-20	
226:11-15			
226:18-19			
226:21-24	CD	226:25	
227:2-3			
227:5-8			
227:11-12			
227:14-18			
227:20-21			

Exhibit B.1: Citibank's Deposition Designations

227:23-25			
228:2-6			
228:10-12			
228:16-18			
228:20-25			
229:2-7			
229:11-25			
230:2-16	V; AF; LC; FRE 602; 306(b)(6)	230:17-18	
230:19-25			
231:2-4			
231:6-10			
231:13-25			
232:2-7	V; AF; LC; FRE 602; 306(b)(6)	232:8-9	
232:10-17			
232:20-25			
233:2-10	MT	233:11	
233:13-14			
233:16-19			
233:21-25			
234:4			

Exhibit B.1: Citibank's Deposition Designations

Deposition of Elizabeth DiPoalo (ZAIS 30(b)(6)), dated October 20, 2020

Citibank's Designations	Defendants' Objections to Citibank's Designations	Defendants' Counter-Designations	Citibank's Objections to Defendants' Counter-Designations
10:22-25			
11:2-5			
11:12-25			
12:2-4			
17:4-7	30(b)(6)		
17:10-13	30(b)(6)		
17:25	30(b)(6)		
40:12-17	30(b)(6); FRE 401		
40:22-25	30(b)(6); FRE 401		
41:2-8	30(b)(6); FRE 401		
41:11	30(b)(6); FRE 401		
62:19-21	30(b)(6); FRE 401	62:5-63:22	
62:24-25	30(b)(6); FRE 401	62:5-63:22	
63:2-3	30(b)(6); FRE 401	62:5-63:22	
63:5	30(b)(6); FRE 401	62:5-63:22	
72:23-25	30(b)(6)	72:7-74:18	
73:2	30(b)(6)	72:7-74:18	
73:5-6	30(b)(6)	72:7-74:18	
74:7-12	30(b)(6)	72:7-74:18	
74:14-18	30(b)(6)	72:7-74:18	
81:3-5	FRE 602	81:3-82:17	
81:10-20	FRE 602	81:3-82:17	
82:11-17		81:3-82:17	
85:25			
86:2-15			
87:3-10			
92:14-18			
92:20-25			
103:11-15		102:20-105:13	
103:17-20		102:20-105:13	
104:12-15		102:20-105:13	
104:18-22		102:20-105:13	
104:25		102:20-105:13	
105:2-5		102:20-105:13	
107:13-16	30(b)(6)		
107:19-22	30(b)(6)		

Exhibit B.1: Citibank's Deposition Designations

113:21-25	FRE 802		
114:2	FRE 802		
114:4-6	FRE 802		
122:10-16	FRE 802		
124:3-23	FRE 802		
125:19-25	FRE 802		
126:3-8	FRE 802		

Exhibit B.1: Citibank's Deposition Designations

Deposition of Melross Meneses (ZAIS 30(b)(6)), dated October 20, 2020

Citibank's Designations	Defendants' Objections to Citibank's Designations	Defendants' Counter-Designations	Citibank's Objections to Defendants' Counter-Designations
8:12-22			
9:6-19		10:5-12	
9:22-23			
23:13-16		22:13-23-12	
23:20			
24:9-24			
26:24-25			
27:2-11		27:12-20	
27:21-25		61:16-62:25; 63:11-20	
28:2			
28:8			
28:18-23	V		
29:5	V		
29:9-10	V		
45:21-25	FRE 602; ID; FRE 802	46:15-47-2	
47:9-14	FRE 602; ID; FRE 802	47:21-48:3; 48:15-49-12; 51:5-22; 52:14-53:17; 53:25-54:25; 59:11-24; 60:10-61:5; 75:24-76:17; 77:11-78:10; 79:10-80:6	
47:19-20	FRE 602; ID; FRE 802	47:21-48:3; 48:15-49-12; 51:5-22; 52:14-53:17; 53:25-54:25; 59:11-24; 60:10-61:5; 75:24-76:17; 77:11-78:10; 79:10-80:6	
48:4-9	FRE 602; ID; FRE 802	47:21-48:3; 48:15-49-12; 51:5-22; 52:14-53:17; 53:25-54:25; 59:11-24; 60:10-61:5; 75:24-76:17; 77:11-78:10; 79:10-80:6	

Exhibit B.1: Citibank's Deposition Designations

48:13-14	FRE 602; ID; FRE 802	47:21-48:3; 48:15-49:12; 51:5-22; 52:14-53:17; 53:25-54:25; 59:11-24; 60:10-61:5; 75:24-76:17; 77:11-78:10; 79:10-80:6	
70:23-25		64:18-67:5; 68:2-20; 71:25-72:24	
71:2-11		64:18-67:5; 68:2-20; 71:25-72:24	
71:14-18		64:18-67:5; 68:2-20; 71:25-72:24	